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12 *Attorneys for Defendant Laylow  
13 Films, Inc.*

14  
15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 GENERAL CROOK,

18 v.  
19 Plaintiff,

20 WALT DISNEY COMPANY; HEARST  
21 COMMUNICATIONS, INC.; LAYLOW  
22 FILMS, INC.; HOULIHAN FILM MUSIC  
23 INC.; BURGESS L. GARDNER d/b/a  
24 MERYE-EARL MUSIC; and JOHN DOE  
25 AND MARY ROE,

26 Defendants.

27 Case No.

28 **NOTICE OF REMOVAL  
PURSUANT TO 28 U.S.C. § 1441 (a)**

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TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

TO: General Crook, Plaintiff *pro se*:

1. Laylow Films, Inc. ("LFI") is one of the defendants in the civil action

Crook v. Walt Disney Co. et. al., No. A-18-772523-C, brought by Plaintiff General Crook ("Crook") on April 10, 2018 in the Eighth Judicial District Court, Clark County, Nevada (the "Litigation"). Pursuant to 28 U.S.C. §§ 1441 and 1446, LFI hereby removes this action to the

1 United States District Court for the District of Nevada, the judicial district in which the  
2 underlying Litigation is pending.

3           2. LFI removes the Litigation on the ground that Crook has alleged, *inter*  
4 *alia*, violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125, and the Copyright Act, 17  
5 U.S.C. § 501. Accordingly, removal is proper under 28 U.S.C. § 1441(a) because, if this action  
6 had been filed in federal court, this Court would have (i) original subject matter jurisdiction over  
7 Crook's federal trademark and copyright infringement claims pursuant to 28 U.S.C. § 1331  
8 (federal question); and (ii) supplemental jurisdiction over Crook's related Nevada state-law  
9 claims pursuant to 28 U.S.C. § 1337(a).

10           3. This notice is timely under 28 U.S.C. § 1446 (b)(1) as it was filed within  
11 thirty days after April 17, 2018, the date on which LFI received a copy of the complaint filed in  
12 the Litigation from co-defendant ESPN, Inc. As of the filing of this notice, to LFI's knowledge  
13 neither LFI nor any other defendant in the Litigation has been properly served. LFI reserves all  
14 rights and defenses, including without limitation defenses as to the lack of service of process  
15 and/or insufficiency of service of process.

16           4. To LFI's knowledge, the only pleadings filed in the underlying Litigation  
17 to date is Crook's complaint, which is attached hereto as Exhibit A.

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1           5.     Defendant is providing Plaintiff written notice of the filing of this Notice  
2 of Removal as required by 28 U.S.C. § 1446(d). Further, Defendant is filing a copy of this  
3 Notice of Removal with the Clerk of the District Court, Clark County, Nevada, where the action  
4 is currently pending.

5           Dated May 9, 2018.  
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7           Respectfully,  
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9           **KENNEDY & COUVILLIER**  
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11           /s/ Todd E. Kennedy  
12

13           Todd E. Kennedy, Bar. No. 6014  
14           Maximiliano D. Couvillier III, Esq.  
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22           *Attorneys for Defendant Laylow Films, Inc.*

23           **CERTIFICATE OF SERVICE**

24           I certify that on May 9, 2018, I caused to be served the foregoing Notice of Removal on  
25 Plaintiff General Crook by placing the same in the United States Mail addressed to:  
26

27           General Crook  
28           4319 Bucking Bronco Road  
29           North Las Vegas, Nevada 89032

30           /s/ Todd E. Kennedy  
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32           An employee of Kennedy & Couvillier  
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